



## MEMO ENDORSED

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July 26, 2021

**VIA ECF**

Hon. Kenneth M. Karas  
United States District Court  
Southern District of New York  
United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601

**Re: *United States v. Darren Lindsay, et al. (Indigo Grant), 21-cr-441-6 (KMK)***

Dear Judge Karas:

We represent Defendant Indigo Grant in the above-captioned case. We write to respectfully request a temporary bail modification of deadlines associated with Magistrate Judge McCarthy's bail order, dated July 14, 2021. In Judge McCarthy's Order, the Court required Ms. Grant to submit proof of the government's secured interest in real property by July 28, 2021. Because undersigned counsel only was recently retained, we respectfully seek an enlargement of time of seven (7) days to perfect the necessary paperwork for filing with the local Court of Ms. Grant's residence to secure the property. Specifically, we ask the Court to endorse this letter motion, enlarging the time to submit documents confirming the secured interest by August 4, 2021.

We have conferred with counsel for the government who have no objection to this request.

Respectfully submitted,

Granted.

So Ordered.

A handwritten signature in black ink, appearing to read "Ilana Haramati", written over a horizontal line.

7/26/21

/s/ HEM

Henry E. Mazurek  
Ilana Haramati  
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New York, New York 10017

*Counsel for Defendant Indigo Grant*

cc: Counsel of record (via ECF)